FORM 27 Rev 5/22

State of Colorado
Energy & Carbon Management Commission

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Report taken by: Kyle Waggoner

Site Investigation and Remediation Workplan (Initial Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.
This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by ECMC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27.
This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.
Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATON

Name of Operator: DCP OPERATING COMPANY LP Operator No: 4680
Address: 2331 CITYWEST BLVD., S812-02
City: HOUSTON State: TX Zip: 77042
Contact Person: Chandler Cole Email: chandler.e.cole@p66.com

Phone Numbers
Phone: (970) 378-6373
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PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 37023 Initial Form 27 Document #: 403883118

PURPOSE INFORMATION

- [ ] Rule 913.c.(1): Pit or Cuttings Trench closure.
- [ ] Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- [X] Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- [ ] Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- [ ] Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- [ ] Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- [ ] Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- [ ] Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- [ ] Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- [ ] Rule 913.g: Changes of Operator.
- [ ] Rule 915.b: Request to leave elevated inorganics in situ.
- [X] Other: Initial workplan

SITE INFORMATION

No Multiple Facilities

Facility Type: SPILL OR RELEASE Facility ID: 486729 API #: County Name: WELD
Facility Name: Four Parmlee (H-6-9) 3/2024 Latitude: 40.252892 Longitude: -104.266391
** correct Lat/Long if needed: Latitude: Longitude:
QtrQtr: NESE Sec: 1 Twp: 3N Range: 62W Meridian: 6 Sensitive Area? Yes

SITE CONDITIONS

General soil type - USCS Classifications SP
Most Sensitive Adjacent Land Use Range
Is domestic water well within 1/4 mile? No
Is surface water within 1/4 mile? No
Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- [X] **E&P Waste**
  - [ ] Produced Water
  - [ ] Oil
  - [X] Condensate
  - [ ] Drilling Fluids
  - [ ] Drill Cuttings
- [ ] **Other E&P Waste**
  - [ ] Workover Fluids
  - [ ] Tank Bottoms
  - [ ] Pigging Waste
  - [ ] Rig Wash
  - [ ] Spent Filters
  - [ ] Pit Bottoms
  - [ ] Other (as described by EPA) _____
- [ ] **Non-E&P Waste** _____

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	SOILS	Undetermined	Laboratory analysis

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

In March 2024, a potential oil and gas release was discovered during a routine flyover of a gas gathering line at the project location. The gathering line was immediately shut-in, and the gathering line has remained offline since discovery. Investigation was initiated on 5/13/24, and a leak on the east side of gathering line at the 3 o'clock position was discovered. Between 5/13/24 & 7/3/24, DCP Operating Company LP / Phillips 66 (DCP/P66) performed delineation & investigation activities using test pitting & excavation methods. Soils were field screened with a PID instrument which indicated potentially impacted soils surrounding the leak location. Based on physical soil observations, PID readings, and initial laboratory results petroleum hydrocarbon impacts appear to extend to between 50 and 54 feet bgs near the source location and approximately 150' North and South and 100' East & West of the source location. Groundwater was encountered during excavation and test pitting activities at a depth between approximately 40 and 50 feet bgs. During the investigation and remediation activities, approximately 6510 cubic yards of impacted soil was removed and transported to the Waste Management Buffalo Ridge Landfill for disposal. Due to the size of impacted soil distribution and difficult lithology encountered between approximately 20 and 55 feet bgs, excavation activities were discontinued and the excavation was backfilled between 7/30 and 8/9 2024 in anticipation of further investigation work using hollow stem augur (HSA) drilling with continuous core sampling methods. At this time, DCP/P66 anticipates to advance up to twelve soil borings which may be converted to groundwater monitoring wells based on field observations. Drilling activities are anticipated to be in the third quarter 2024. The soil sample analytical data from the soil borings, monitoring wells, and a project update will be submitted via a Form 27-S within 90 days from the submittal date of this report.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

[X] Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Between May 13, 2024 and July 3, 2024, a total of 25 grab soil samples have been collected from the site at the locations and depths illustrated on the attached site figures. Additional soil sampling will be conducted by hollow stem augur drilling methods with continuous core sampling at up to 12 locations at the site. Soil samples will be collected from the depth with the highest PID detection, just above the saturated interval, and the total depth of the boring. Soil samples will be submitted to Summit Scientific for laboratory analysis. Soil sample results that have been received to date are presented in Tables 1-3 and the soil sample GPS location data are presented on Table 5. A soil sample location map is presented on Figure 3 and the laboratory analytical reports are attached for reference.

Proposed Groundwater Sampling

[X] Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

DCP/P66 may propose additional groundwater monitoring wells at the Site for groundwater delineation based on initial groundwater analytical results. Monitoring well installation will be advanced to approximately 60 feet bgs and will be performed with hollow stem augur drilling with continuous core sampling methods to evaluate soil conditions and geology at the Site.

Proposed Surface Water Sampling

[ ] Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Additional Investigative Actions

[ ] Additional alternative investigative actions described in attached Site Investigation Plan (summary):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected: 25

Number of soil samples exceeeding 915-1: 19

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet): 60000

NA / ND

-- Highest concentration of TPH (mg/kg): 1120

-- Highest concentration of SAR: 1.95

BTEX > 915-1: Yes

Vertical Extent > 915-1 (in feet): 55

Groundwater

Number of groundwater samples collected: 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet): 45

Number of groundwater monitoring wells installed: 0

Number of groundwater samples exceeding 915-1: 0

NA Highest concentration of Benzene (µg/l):

NA Highest concentration of Toluene (µg/l):

NA Highest concentration of Ethylbenzene (µg/l):

NA Highest concentration of Xylene (µg/l):

NA Highest concentration of Methane (mg/l):

Surface Water

0 Number of surface water samples collected

0 Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

[ ] Were impacts to adjacent property or offsite impacts identified?

[X] Were background samples collected as part of this site investigation?

Three (3) background samples were collected from the locations illustrated on Figure 3 and analyzed for the full ECMC Table 915-1 analyte list. Background analytical data were returned with elevated levels of arsenic above the Table 915-1 standards. Based on these data, arsenic concentrations above Table 915-1 standards is naturally occurring at the site.

[X] Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards): 6510

Volume of liquid waste (barrels): 0

[X] Is further site investigation required?

Additional drilling investigation activities, possible monitoring well installation, and groundwater sampling are proposed as discussed herein. Based on sample data collected thus far, additional investigation is required. The site has been backfilled to facilitate investigation conducted by hollow stem augur drilling methods with continuous core sampling that will be performed at the locations determined onsite. Additionally, up to twelve monitoring wells may be installed by hollow stem augur drilling with continuous core sampling methods to evaluate soil conditions and geology at each location. Soil samples will be collected from the depth with the highest PID detection, just above the saturated interval, and the total depth of the boring. Additional monitoring wells may be installed to determine the horizontal and vertical extent of impacts and future data will be presented in a subsequent Form 27 Supplemental workplan within 90 days from the submittal date of this Form 27-I.

REMEDIAL ACTION PLAN

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The section of gathering line where the hole was located has been removed. Approximately 6510 cubic yards (CY), or 9600 tons, of impacted material has been excavated and transported to the Buffalo Ridge Landfill for offsite disposal. Additional remediation activities will be evaluated subsequent to the proposed drilling investigation activities proposed herein.

REMEDIATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

Approximately 6510 cubic yards (CY) of impacted material were excavated and transported to the Buffalo Ridge Landfill. Based on analytical data collected throughout this excavation, additional delineation activities will be addressed in a subsequent Form 27. DCP/P66 may install up to twelve borings/ groundwater monitoring wells at the Site and future data will be presented in a subsequent Form 27 Supplemental workplan within 90 days from the submittal date of this Form 27-I.

Soil Remediation Summary

☐ **In Situ**

- ____ Bioremediation (or enhanced bioremediation)
- ____ Chemical oxidation
- ____ Air sparge / Soil vapor extraction
- ____ Natural Attenuation
- ____ Other ____

☒ **Ex Situ**

- Yes Excavate and offsite disposal
  - If Yes: Estimated Volume (Cubic Yards) 6510
  - Name of Licensed Disposal Facility or ECMC Facility ID # ____
- ____ Excavate and onsite remediation
  - ____ Land Treatment
  - ____ Bioremediation (or enhanced bioremediation)
  - ____ Chemical oxidation
  - ____ Other ____

Groundwater Remediation Summary

- ____ Bioremediation (or enhanced bioremediation)
- ____ Chemical oxidation
- ____ Air sparge / Soil vapor extraction
- ____ Natural Attenuation
- ____ Other ____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

Groundwater was observed within the excavation and at a minimum, one monitoring well will be installed near the source location. Pending well installation and additional investigation, ongoing groundwater monitoring at the Site will be performed as needed.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

[X] Quarterly [ ] Semi-Annually [ ] Annually [ ] Other

[ ] **Request Alternative Reporting Schedule:**

[ ] Semi-Annually [ ] Annually [ ] Other

Rule 913.e:
After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

Report Type: [ ] Groundwater Monitoring [ ] Land Treatment Progress Report [ ] O&M Report

[X] Other Progress update

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).
If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

DCP/P66 maintains appropriate comprehensive general liability insurance to satisfy the requirements of Rule 705.B, with at least $5MM in coverage and including coverage for sudden and accidental release events. The cost provided below for remediation is a preliminary estimate only, costs may change upwards or downward based on site-specific information. DCP/P66 makes no representation or guarantees as the accuracy of the preliminary estimate.

Operator anticipates the remaining cost for this project to be: $ 300000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

NA

Volume of E&P Waste (solid) in cubic yards 6510

E&P waste (solid) description soil

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility: Waste Management Buffalo Ridge

Volume of E&P Waste (liquid) in barrels 0

E&P waste (liquid) description

ECMC Disposal Facility ID #, if applicable:

Non-ECMC Disposal Facility:

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

The excavation and test pit investigation area has been backfilled. Following completion of additional investigation and potential remedial activities, site surfaces will be regraded to match existing conditions with landowner and Weld County approval. Final reclamation will be conducted following completion of the soil investigation and groundwater monitoring once a no further action determination, and eventual site closure is approved by the ECMC.

Is the described reclamation complete? No

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

☐ Interim ☐ Final

Did the Surface Owner provide the seed mix?

If YES, does the seed mix comply with local soil conservation district recommendations?

Did the local soil conservation district provide the seed mix?

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation.

Proposed date of completion of Reclamation.

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 05/14/2024

Actual Spill or Release date, or date of discovery.

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 05/14/2024

Proposed site investigation commencement.

Proposed completion of site investigation. 12/31/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 01/01/2025

Proposed date of completion of Remediation.

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

☐ Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

This Form 27 Initial is being submitted to update the ECMC on the initial investigation and remediation efforts at the Four Parmlee (H-6-9) 3/2024 Release in Weld County, Colorado that was initially reported with a Form 19I (#403789217) and Form 19S (#403800933). Pending additional investigation activities as described herein, DCP/P66 will present proposed remediation activities in a Form 27-Supplemental report. Upon approval of this document and the assignment of a remediation number to this site, DCP/P66 will submit a 90-day Form 19 Supplemental requesting closure of the release to continue under Form 27 reporting.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Chandler Cole Title: Environmental Specialist

Submit Date: 08/09/2024 Email: ECMCnotification@p66.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Kyle Waggoner Date: 09/23/2024

Remediation Project Number: 37023

COA Type	Description
	Operator shall install a minimum of 3 groundwater monitoring wells per Rule 907.b.(9).B.iii and enough to delineate groundwater impacts.
	Operator states groundwater was encountered during the remedial actions described, but did not present any groundwater laboratory data. Groundwater sampling is required for this site per Rule 915.(3).A. Operator shall provide groundwater data on the next form submittal.
	Operator shall analyze additional soil samples for full Table 915-1 contaminates of concern including metals and soil suitability.
	ECMC changed reporting schedule to Quarterly. Operator shall maintain a quarterly reporting schedule until such time as a different reporting schedule is deemed appropriate.
	Operator shall attach lab reports as separate attachments on future submittals.
5 COAs	

ATTACHMENT LIST

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num	Name
403883118	FORM 27-INITIAL-SUBMITTED
403884965	OTHER
403884969	ANALYTICAL RESULTS

Total Attach: 3 Files

General Comments

User Group	Comment	Comment Date
		Stamp Upon Approval

Total: 0 comment(s)